

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

TETHER AND BITFINEX CRYPTO ASSET  
LITIGATION

Case No. 19 Civ. 9236 (KPF)

**DECLARATION OF LAURA M. KING  
IN SUPPORT OF PLAINTIFFS' REPLY MEMORANDUM OF LAW  
IN SUPPORT OF THEIR MOTION FOR LEAVE TO AMEND**

LAURA M. KING, an attorney duly admitted to practice law before this Court, declares as follows:

1. I am a member of the law firm of Selendy Gay Elsberg PLLC, counsel for Plaintiffs and the Proposed Class in the above-captioned action. I submit this Declaration in support of Plaintiffs' Reply Memorandum of Law in Support of Their Motion for Leave to Amend ("Plaintiffs' Motion").

2. Attached as **Exhibit 1** is a true and correct copy of a letter from Ashley Hahn to Philippe Selendy and Todd Schneider, dated May 15, 2023.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of Defendants' First Amended Responses and Objections to Plaintiffs Interrogatories No. 13 to 15, dated July 7, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of a letter from Elliot Greenfield to Philippe Selendy and Todd Schneider, dated September 26, 2023.

5. Attached as **Exhibit 4** is a true and correct copy of the Transcript of the Deposition of Paolo Ardoino on behalf of Bitfinex as its Rule 30(b)(6) designee, dated September 12, 2023.

6. Attached as **Exhibit 5** is a true and correct copy of the Transcript of the Deposition of Giancarlo Devasini, dated October 5, 2023.

7. Attached as **Exhibit 6** is a true and correct copy of the Transcript of the Deposition of Philip Potter, dated October 6, 2023.

8. Attached as **Exhibit 7** is a true and correct copy of a letter from Elliot Greenfield to Philippe Selendy and Todd Schneider, dated October 13, 2023.

9. Attached as **Exhibit 8** is a true and correct copy of the Transcript of the Deposition of Stuart Hoegner on behalf of Bitfinex as its Rule 30(b)(6) designee, dated September 28, 2023.

10. Attached as **Exhibit 9** is a true and correct copy of the Transcript of the Deposition of Paolo Ardoino, dated September 13, 2023.

11. Attached as **Exhibit 10** is a true and correct copy of an exhibit marked “57” during the Deposition of Paolo Ardoino on September 13, 2023. It was previously produced by Defendants in this matter with Bates stamp Bitfinex\_Tether\_1036442.

12. Attached as **Exhibit 11** is a true and correct copy of a letter from Natascha Born to Philippe Selendy and Todd Schneider, enclosing a production of documents, dated September 7, 2023.

13. Attached as **Exhibit 12** is a true and correct excerpted copy of an exhibit marked “6” during the Deposition of the Anonymous Trader on September 10, 2023. It was previously produced by Defendants in this matter with Bates stamp Bitfinex\_Tether\_1017968. It has been redacted to comply with ECF Nos. 439 and 451.

14. Attached as **Exhibit 13** is a true and correct copy of an exhibit marked “3” during the Deposition of the Anonymous Trader on September 10, 2023. It was previously produced by Defendants in this matter with Bates stamp Bitfinex\_Tether\_1070498. It has been redacted to comply with ECF Nos. 439 and 451.

15. Attached as **Exhibit 14** is a true and correct copy of the Transcript of the Deposition of Ludovicus Van der Velde, dated September 29, 2023.

16. Attached as **Exhibit 15** is a true and correct excerpted copy of the Transcript of the Deposition of the Anonymous Trader, dated September 10, 2023.

17. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, NY  
January 12, 2024

/s/ Laura M. King  
Laura M. King